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EXECUTIVE DIRECTOR

DELAWARE RIVER BASIN COMMISSION  
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HEADQUARTERS LOCATION  
25 STATE POLICE DRIVE  
WEST TRENTON, N. J.

August 18, 1995

Thomas Ficklin  
X-253

Mr. Cesar Lee, Remedial Project Manager  
U.S. Environmental Protection Agency, Region III  
841 Chestnut Building (3HW21)  
Philadelphia, PA 19107

Dear Mr. Lee:

We have reviewed the Proposed Plan for remediating the Metal Bank Superfund Site and have severe reservations about the adequacy of the proposed actions to protect resident fish and aquatic life in the adjacent Delaware River. Currently three states (Delaware, Pennsylvania and New Jersey) have issued advisories on consuming anadromous and resident fish including striped bass, white perch and catfish due to elevated levels of polychlorinated biphenyls (PCBs) in their tissue. The Commission is currently completing Phase I of a program to control toxic pollutants discharged to the tidal Delaware River between Trenton, NJ and Delaware Bay. This phase is focusing on point sources of toxic pollutants, specifically industrial and municipal waste treatment plant discharges. Monitoring conducted under the auspices of this program have not revealed these sources to contain detectable levels of PCBs. Additional monitoring is planned for the coming year to determine whether PCBs are present in these discharges at very low levels. Phase II of this program will focus on non-point sources of toxic pollutants including Superfund sites with special emphasis on PCBs, DDT and its metabolites. In view of the current consumption advisories and proximity of the site to the river, this site must be considered a significant source of PCBs. Data collected by the Commission in 1994 indicated that the highest concentration of PCBs in the tissues of white perch and channel occurred at the Tacony-Palmyra Bridge station approximately 1 mile from the site.

We are concerned about the lack of sufficient data to characterize both the spatial extent of contaminated sediments in the river, the location and PCB concentration in soil "hot spots" in the southern portion of the site near the river, and the extent of non-aqueous phase liquids in the same area. An appropriate remediation plan cannot be selected until the extent of contamination of river sediment is determined and the effectiveness of any treatment system for the non-aqueous phase liquids is established. We are concerned that dewatering operations from the proposed installation of a sheet metal cofferdam and dredging in the mudflat and river may mobilize PCBs associated with the sediment further exacerbating fish tissue contamination in the Delaware Estuary. We also note no assessment of the potential impact on the City of Philadelphia drinking

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Mr. Cesar Lee

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water intake just 2.5 miles upstream of the site. Past studies have documented upstream excursions of approximately seven miles during twice daily flood tides.

It should be noted that the Commission is proposing a water quality criterion for the protection of human health from the ingestion of fish and water for total PCBs of 0.000044  $\mu\text{g/l}$ . The Commonwealth of Pennsylvania's current criterion for total PCBs is also 0.000044  $\mu\text{g/l}$ . Given the lack of data on the contribution of PCBs from the site to the river, and any detailed assessment of the dilution of PCBs entering the river from the site, the selection of a remediation plan is premature.

The U.S. Environmental Protection Agency Region III and the Delaware River Basin Commission executed a Memorandum of Agreement (MOA) in October 1991 with respect to Superfund sites located within EPA Region III that are subject to the jurisdiction of the Commission. Our review of the proposed plan indicates that the discharge and withdrawal facilities are covered by the MOA.

Sincerely,



David P. Pollison  
Acting Chief Engineer

c: Commissioner Vincent P. D'Anna  
R. Ryan, PADEP  
R. Greene, DNREC  
Shing Fu Hsueh, NJDEP

cc: From CLEE 8/23/95

P. ANDERSON (3H021)

E. LUKENS (3R023)

J. FIELD, NOAA

P. KNIGHT (3H002)

B. LAUMER, H 0 (2272)

Tom Fiksin 8/23

(1) Reviewable Project?

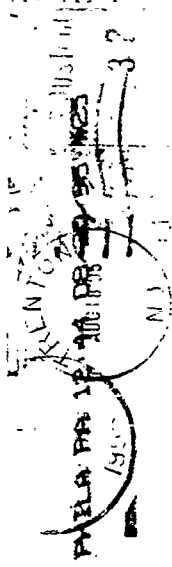
(2) Enough info to make decision?

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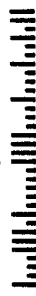
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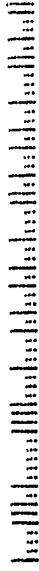
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